

LISA A. RASMUSSEN, ESQ.
Nevada Bar No.7491
THE LAW OFFICES OF KRISTINA
WILDEVELD & ASSOCIATES
550 E. Charleston Blvd., Suite A
Las Vegas, NV 89104
Phone (702) 222-0007
Fax (702) 222-0001

Attorneys for Plaintiff Yessica Ortiz

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

| | | |
|--------------------------|---|---------------------------------|
| YESSICA ORTIZ, |) | |
| |) | CASE NO. 2:20-cv-1816 APG-BNW |
| Plaintiff, |) | |
| |) | |
| vs. |) | STIPULATION AND ORDER TO |
| |) | EXTEND DEADLINES |
| SONORAN BARBEQUE NEVADA, |) | |
| LLC; BERTHA LOREA ZAPEDA |) | (Second Stipulation) |
| |) | |
| Defendant. |) | |

COME NOW the parties, Yessica Ortiz, by and through her counsel, Lisa A. Rasmussen, Esq. and Bertha Lorea Zapeda, by and through her counsel, Troy A. Clark, Esq. and Sonoran Barbeque Nevada, LLC, by and through its counsel, Ogonna Brown, and hereby stipulate as follows:

1. This matter was filed in the Eighth Judicial District Court in July 2020.
2. Ms. Lorea Zapeda was served with a copy of the Complaint and Summons in September 2020.
3. Sonoran Barbeque Nevada, LLC was served with a copy of the Complaint and Summons in September 2020.

1 4. On September 30, 2020, Zapeda's counsel removed the matter to this Court.
2 [ECF 1.] Ms. Lorea Zapeda's Statement of Removal was also filed on September 30, 2020.
3 [ECF 5.]

4 5. Ms. Lorea Zapeda also filed a Motion to Dismiss the Complaint on September
5 30, 2020. [ECF 6.] A response to Ms. Lorea Zapeda's Motion is due on or before November
6 15, 2020.

7 6. On October 1, 2020, this Court issued an Order to Show Cause to the Defendants
8 as to why this matter should not be remanded back to state court based on lack of subject matter
9 jurisdiction. [ECF 8.] The Court set a deadline of on or before October 16, 2020 for a response
10 from the defendants and that deadline was extended to November 15, 2020 pursuant to a prior
11 stipulation by the parties.

12 7. Sonoran Barbeque of Nevada presently has an answer or responsive pleading due
13 in this matter on or before November 15, 2020.

14 8. All parties participated in a mediation hearing on October 8, 2020 and they have
15 resolved all claims. All settlement documents have been executed and the final step remaining
16 with this matter is to file a Joint Motion for Dismissal with prejudice. This cannot be done until
17 Plaintiff's counsel receives the funds agreed upon in the settlement agreement. The parties
18 anticipate that funds will be received within the next two weeks, but out of an abundance of
19 caution, they request a 30-day extension of all deadlines identified herein. The funds will be
20 paid by a non-party to this litigation.

21 9. It would be a waste of resource and unnecessary for Plaintiff to respond to
22 pending Motion to Dismiss and it would also be a waste of resource and unnecessary for the
23 defendants to respond to the Complaint or this Court's Order to Show Cause as the matter will
24 be dismissed with prejudice shortly.

 10. Accordingly, the parties stipulate to extend all pending deadlines to December
15, 2020.

 11. This is the second stipulation entered into by the parties to extend these
deadlines.

-3-